

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE NEW JERSEY TAX SALES
CERTIFICATES ANTITRUST
LITIGATION

Master Docket

Civil Action No. 3:12-01893(MAS) (TJB)

NOTICE OF MOTION TO JOIN

PLEASE TAKE NOTICE that on June 2, 2014, or as soon thereafter as counsel can be heard, the undersigned counsel for defendants Joseph Wolfson, Richard Simon Trustee, and Betty Simon Trustee, LLC shall move before the Honorable Michael A. Shipp of the United States District Court for the District of New Jersey at 402 East State Street, Trenton, New Jersey 08609, for an Order granting defendants' motion to join in Arguments I, II, III, and IV of Defendant's Joint Motion to Dismiss Plaintiffs' Amended Complaint (Doc. No. 341) to the extent to which any of these Arguments may apply to the interests of defendants Joseph Wolfson, Richard Simon Trustee, and Betty Simon Trustee, LLC.

Respectfully submitted,

JACOBS & BARBONE, P.A.
Attorneys for Defendants
Joseph Wolfson, Richard Simon Trustee and
Betty Simon Trustee, LLC

/s/ Michael F. Myers
Michael F. Myers, Esquire
Edwin J. Jacobs, Jr., Esquire

Dated: March 14, 2014